

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : NO. 19-11433 - AMC
JENNIFER I.MILLER aka :
JENNIFER I.MILLER : CHAPTER 13

**OBJECTION TO CERTIFICATION OF DEFAULT BY
SPECIALIZED LOAN SERVICING LLC**

PLEASE TAKE NOTICE that the debtor objects to the Certification of Default upon the follow grounds:

1. Debtor is in substantial compliance but works retail and has lost significant income due to Covid 19..
2. Movant's numbers not correct and debtors have not been fully credited for payments made.
3. Debtor has the ability to catch up on all post-petition arrears with a modified plan.

WHEREFORE, debtor respectfully requests that the Certification of Default be DENIED.

September 10, 2020

/s/ Michael P. Kelly
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